

# EXHIBIT B



UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION

CONSOLIDATED INDUSTRIES, LLC d/b/a WEATHER KING  
PORTABLE BUILDINGS,

Plaintiff,

v. Civil Action No. 1:22-cv-01230  
JESSE A. MAUPIN, BARRY D. HARRELL, ADRIAN S. HARROD,  
LOGAN C. FEAGIN, STEPHANIE L. GILLESPIE, RYAN E.  
BROWN, DANIEL J. HERSHBERGER, BRIAN L. LASSEN,  
ALEYNA LASSEN, and AMERICAN BARN CO., LLC,

Defendants.

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TAKEN ON

WEDNESDAY, MAY 7, 2025

10:01 A.M.

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1 -	<b>1 Hickory.</b>
2 MR. PASTERNAK: You can write me a note.	2 A. Right.
3 MR. MAUPIN: Oh, sorry.	3 Q. <b>Did they come back with a different</b>
4 MR. PASTERNAK: Yeah, you can't talk on	4 <b>number?</b>
5 the record, Jesse.	5 A. No.
6 MR. MAUPIN: Sorry.	6 Q. <b>So they accepted what you offered?</b>
7 BY MR. PASTERNAK:	7 A. It was the face value of the products.
8 Q. <b>Have you talked to Ms. Coker about this</b>	8 Q. <b>Do you remember anything about your</b>
9 <b>litigation?</b>	9 <b>conversations with Ms. Coker about the litigation?</b>
10 A. I guess we discussed it. I don't know, I	10 A. No.
11 don't know when, but I guess we have talked about	11 Q. <b>Do you remember anything about your -- did</b>
12 it. I'm sure we have.	12 <b>you have conversations with Mr. Boyd about the</b>
13 Q. <b>Who made -- who made the decision to bring</b>	13 <b>litigation?</b>
14 <b>the litigation?</b>	14 A. Probably, but I don't have a clue what
15 A. I guess we as a team did. I guess the	15 they were at this time.
16 four of us.	16 Q. <b>You just don't remember?</b>
17 Q. <b>And when was that decision made?</b>	17 A. No, not three years later.
18 A. I couldn't tell you the date on it. I	18 Q. <b>How about any conversations with Mr.</b>
19 just know we -- we -- after the -- after we found	19 <b>Sullivan about the litigation?</b>
20 out all the damage we had.	20 A. No.
21 Q. <b>What was that damage?</b>	21 Q. <b>You never had any or you don't remember?</b>
22 A. Well, you know, they ruined our business.	22 A. I don't know any. I don't -- I don't
23 You know, they stole our employees. They stole our	23 remember, because, you know, we probably talked
24 shop -- I mean the shop employees, the drivers. I	24 about it. I don't remember what it was at the time.
25 mean . . .	25 Q. <b>Did you have any conversation with Mr.</b>
Page 19	Page 21
1 Q. <b>And that was why you decided to sell the</b>	1 <b>Hammond about the litigation?</b>
2 <b>southern -- or the western operation's assets to Old</b>	2 A. I told him that we planned on doing it.
3 <b>Hickory, correct?</b>	3 No, I -- he wasn't in the meeting, I don't think,
4 A. Right.	4 when we did it, talked about it.
5 Q. <b>How did that transaction come about?</b>	5 A. Who was in that meeting?
6 A. We were having a meeting and I think I	6 A. Tim and David, myself.
7 brought it up. I said, you know, we didn't -- we	7 Q. <b>Have you talked to anyone else about this</b>
8 were looking for somebody else besides ABCO to sell	8 <b>litigation?</b>
9 it to, and I said, you know, I might give Brian a	9 A. I don't remember. No one that I remember.
10 call and see if he's interested. And I did. All --	10 Q. <b>Did you do anything to prepare for your</b>
11 all four of us had barn companies. Any one of us	11 <b>deposition today?</b>
12 could have bought it ourselves, but it was such a	12 A. Not really.
13 wreck, we didn't want it.	13 Q. <b>Did you meet with your lawyer?</b>
14 Q. <b>What did you say to Brian when you called</b>	14 A. I did.
15 <b>him?</b>	15 Q. <b>When?</b>
16 A. I just told him what we had, and wanted to	16 A. Yesterday afternoon.
17 see if he'd be interested. He said he'd take a	17 Q. <b>For how long?</b>
18 look.	18 A. Thirty minutes.
19 Q. <b>And who came up with the purchase price?</b>	19 Q. <b>Did you look at any documents?</b>
20 A. I guess we all did, you know.	20 A. Only -- I don't think so. I don't know of
21 Q. <b>Was it from Old Hickory to you or from you</b>	21 any documents we looked at.
22 <b>to Old Hickory?</b>	22 Q. <b>When did you first hear about Jesse</b>
23 A. Come again?	23 <b>planning on starting his own company?</b>
24 Q. <b>Who -- who -- who -- you said all came up</b>	24 A. We -- David called me and said, we got a
25 <b>with the purchase price, and you offered that to Old</b>	25 problem, you need to come up. So I came up, and he

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26 to 29

<p style="text-align: right;">Page 26</p> <p>1       <b>Q. Did you do anything else?</b></p> <p>2       A. I don't know what it would be. I don't --</p> <p>3       I can't think of anything else.</p> <p>4       <b>Q. After the American Barn folks had been</b></p> <p>5       <b>fired, did you travel with Jesse?</b></p> <p>6       A. Yes, I did.</p> <p>7       <b>Q. So you had no trouble continuing to work</b></p> <p>8       <b>with him, correct?</b></p> <p>9       A. Not at that point. We thought that we'd</p> <p>10      -- there's a good chance we were going to sell it to</p> <p>11      him, so I went out there so -- with him to do the</p> <p>12      inventory.</p> <p>13      <b>Q. You thought you were going to sell what to</b></p> <p>14      <b>him?</b></p> <p>15      A. The inventory.</p> <p>16      <b>Q. The inventory at where?</b></p> <p>17      A. The western shops.</p> <p>18      <b>Q. All of the western shops?</b></p> <p>19      A. We had thought -- yes, but I didn't</p> <p>20      realize the extent of what all had been done either.</p> <p>21      <b>Q. What did you come to realize had been</b></p> <p>22      <b>done?</b></p> <p>23      A. That he had stolen our financial</p> <p>24      statements and our profit and loss, and shown it to</p> <p>25      other people.</p>	<p style="text-align: right;">Page 28</p> <p>1       I met him. He ran a shop in Wilcox, I think.</p> <p>2       <b>Q. Did you ever talk to him?</b></p> <p>3       A. See, I talked to him on the phone. I</p> <p>4       think I said that while ago, that I talked to him on</p> <p>5       the phone right after to try to get him to stay with</p> <p>6       us, and he wasn't interested.</p> <p>7       <b>Q. Did you tell him that you did not realize</b></p> <p>8       <b>how bad the upper management was at running a</b></p> <p>9       <b>business?</b></p> <p>10      A. Do what now?</p> <p>11      <b>Q. Did you ever tell him that you did not</b></p> <p>12      <b>realize how bad the upper management was at running</b></p> <p>13      <b>a business?</b></p> <p>14      A. I don't recall that.</p> <p>15      <b>Q. And did you ever tell him, if you had</b></p> <p>16      <b>known they were that bad you would never have taken</b></p> <p>17      <b>them on as partners?</b></p> <p>18      A. No.</p> <p>19      <b>Q. Did you tell him that you -- if you had</b></p> <p>20      <b>known what Jesse was going to do, you would have</b></p> <p>21      <b>stepped in and corrected problems at Weather King?</b></p> <p>22      A. I don't recall.</p> <p>23      <b>Q. What are you -- what did you think of</b></p> <p>24      <b>Jesse Maupin when he worked at Weather King?</b></p> <p>25      A. I liked him.</p>
<p style="text-align: right;">Page 27</p> <p>1       <b>Q. And again, how did you find out about</b></p> <p>2       <b>that?</b></p> <p>3       A. Well, through our meetings that we had.</p> <p>4       <b>Q. Did you think about offering the Weather</b></p> <p>5       <b>King assets in the western operations to other</b></p> <p>6       <b>buyers besides Old Hickory?</b></p> <p>7       A. We didn't discuss it. We just wanted to</p> <p>8       get -- get our money back, the sooner the better.</p> <p>9       <b>Q. And you think that what you sold it for</b></p> <p>10      <b>was a fair price?</b></p> <p>11      A. All three of us -- I mean four of us had</p> <p>12      an opportunity to buy it ourselves. We didn't want</p> <p>13      it, the shape it was in, and the distance it was.</p> <p>14      We didn't have people could do it.</p> <p>15      <b>Q. So the four partners considered buying the</b></p> <p>16      <b>assets?</b></p> <p>17      A. No. I said we could have.</p> <p>18      <b>Q. What was your son's reaction when you told</b></p> <p>19      <b>him about what had happened?</b></p> <p>20      A. He was stunned just like we were, I guess,</p> <p>21      that this had happened.</p> <p>22      <b>Q. Do you remember what he said?</b></p> <p>23      A. No.</p> <p>24      <b>Q. Do you know someone named Patrick Bays?</b></p> <p>25      A. I know of him. I don't think I've ever</p>	<p style="text-align: right;">Page 29</p> <p>1       <b>Q. Do you like him now?</b></p> <p>2       A. Thought a lot of him. Huh?</p> <p>3       <b>Q. Do you like him now?</b></p> <p>4       A. I have a hard time accepting what he did</p> <p>5       to us. I hate it.</p> <p>6       <b>Q. If you had known what he was planning on</b></p> <p>7       <b>doing, would you have tried to stop him?</b></p> <p>8       A. Well, sure. Yes.</p> <p>9       <b>Q. What would you -- what would you have</b></p> <p>10      <b>done? Would you have corrected any problems he</b></p> <p>11      <b>pointed out?</b></p> <p>12      A. I'd have tried.</p> <p>13      A. Did he ever point out problems at Weather</p> <p>14      King to you?</p> <p>15      A. I don't think while he was -- not until</p> <p>16      after, after he left.</p> <p>17      <b>Q. After he left, he pointed out problems?</b></p> <p>18      A. He just talked like he -- he and David</p> <p>19      didn't get along real well, so . . .</p> <p>20      <b>Q. So that was one problems he pointed out,</b></p> <p>21      <b>that he didn't --</b></p> <p>22      A. No.</p> <p>23      <b>Q. -- get along with David?</b></p> <p>24      A. That was later. That was after the fact.</p> <p>25      <b>Q. So you continued to talk to Jesse after he</b></p>